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TRAFFICSCHOOL.COM, INC. and

8 DRIVERS ED DIRECT, LLC

9 **UNITED STATES DISTRICT COURT**

10 **CENTRAL DISTRICT OF CALIFORNIA**

11  
12 TRAFFICSCHOOL.COM, INC., a  
13 California corporation; DRIVERS ED  
14 DIRECT, LLC, a California limited  
liability company,

15 Plaintiffs,

16 vs.

17 EDRIVER, INC., ONLINE GURU,  
18 INC., FIND MY SPECIALIST, INC.,  
and SERIOUSNET, INC., California  
19 corporations; RAVI K. LAHOTI, RAJ  
LAHOTI, individuals,

20 Defendants.

CASE NO. CV 06-7561 PA (CWx)  
*The Hon. Percy Anderson*

**PLAINTIFFS' REPLY TO  
DEFENDANTS' EVIDENTIARY  
OBJECTIONS TO AND MOTION TO  
STRIKE PORTIONS OF THE  
DECLARATION OF MINA I.  
HAMILTON SUBMITTED IN  
SUPPORT OF THE JOINT STATUS  
REPORT**

Date: December 5, 2011

Time: 1:30 p.m.

Crtrm.: 15

Complaint Filed: November 28, 2006

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25 Defendants have belatedly and untimely filed evidentiary objections to Mina  
26 Hamilton's Declaration and its exhibits provided in the Joint Status Report (which  
27 was filed well over a month ago).

4848-8508-2382.1

28 **PLAINTIFFS' REPLY TO DEFENDANTS' EVIDENTIARY OBJECTIONS TO DECLARATION OF MINA I.  
HAMILTON SUBMITTED IN SUPPORT OF THE JOINT STATUS REPORT**

1 This was done by Defendants without leave from or invitation made by the  
2 Court.

3 Further Defendants failed to meet and confer as required by the Local Rules.  
4 For these reasons this pleading should be stricken.

5 In an abundance of caution and to preserve its rights Plaintiffs also make the  
6 following observations and replies.

- 7 • The evidence presented by Ms. Hamilton's Declaration was soundly  
8 presented for each exhibit attached to Ms. Hamilton's Declaration;
- 9 • The evidence goes to the core points at issue in this litigation: the  
10 continued deceitful practices of the Defendants and the need for the  
11 protections and restraint by injunction and thus, *the need for fee*  
12 *recovery regarding same*; and
- 13 • To the extend that that Defendants offer of some sort of alternative  
14 evidence (attached to Lahoti's Declaration), that evidence is not what  
15 the Best Evidence Rule is directed to and is misperceived by  
16 Defendants (F.R.E., Rules 1002-1004). Offering alternative evidence,  
17 as done by Lahoti, is not what this evidentiary rule addresses.

18  
19 DATED: November 21, 2011

LEWIS BRISBOIS BISGAARD & SMITH LLP

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22 By: /s/ Mina I. Hamilton

Mina I. Hamilton

Attorneys for Plaintiffs

TRAFFICSCHOOL.COM, INC. and  
DRIVERS ED DIRECT, LLC